

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
DISTRICT OF TEXAS AMARILLO DIVISION**

ALLIANCE FOR HIPPOCRATIC MEDICINE,)
on behalf of itself, its member organizations, their)
members, and these members' patients;)
AMERICAN ASSOCIATION OF PRO-LIFE) **Case No. 2:22-cv-00223-z**
OBSTETRICIANS AND GYNECOLOGISTS,)
on behalf of itself, its members, and their patients;)
AMERICAN COLLEGE OF PEDIATRICIANS,)
on behalf of itself, its members, and their patients;)
CHRISTIAN MEDICAL & DENTAL)
ASSOCIATIONS, on behalf of itself, its members)
and their patients; **SHAUN JESTER, D.O.,** on)
behalf of himself and his patients; **REGINA**)
FROST-CLARK, M.D., on behalf of herself and)
her patients; **TYLER JOHNSON, D.O.,** on)
behalf of himself and his patients; and **GEORGE**)
DELGADO, M.D., on behalf of himself and his)
Patients,

Plaintiffs,

v.

U.S. FOOD AND DRUG ADMINISTRATION;)
ROBERT M. CALIFF, M.D., in his official)
capacity as Commissioner of Food and Drugs, U.S.)
Food and Drug Administration; **JANET**)
WOODCOCK, M.D., in her official capacity as)
Principal Deputy Commissioner, U.S. Food and)
Drug Administration; **PATRIZIA CAVAZZONI,**)
M.D., in her official capacity as Director, Center for)
Drug Evaluation and Research, U.S. Food and Drug)
Administration; **U.S. DEPARTMENT OF**)
HEALTH AND HUMAN SERVICES; and)
XAVIER BECERRA, in his official capacity as)
Secretary, U.S. Department of Health and Human)
Services,)

Defendants.

APPLICATION FOR ADMISSION PRO HAC VICE

- I. Applicant is an attorney with Advancing American Freedom, Inc., located at 801 Pennsylvania Avenue, N.W., Suite 930 Washington, D.C. 20004, a phone number of (202) 780-4848.
- II. Applicant will sign all filings with the following name: J. Marc Wheat
- III. Applicant seeks pro hac vice admission for purposes of filing an Amicus Brief in the above-styled case on behalf of Advancing American Freedom.
- IV. Applicant J. Marc Wheat is a member in good standing of the bar of the highest court of the Commonwealth of Virginia, where Applicant regularly practices law. Virginia State Bar #39602 admitted April 26, 1996.
- V. Applicant has also been admitted to practice before 4th Circuit Court of Appeals on June 3, 1996; the 8th Circuit Court of Appeals on November 4, 2022; the 5th Circuit Court of Appeals on February 6, 2023; and the United States Supreme Court on October 3, 2022.
- VI. Applicant has never involuntarily lost, temporarily or permanently, the right to practice before any court or tribunal, or resigned in lieu of discipline.
- VII. Applicant has never been subject to grievance proceedings or involuntary removal proceedings – regardless of outcome – while a member of the bar of any state or federal court or tribunal that requires admission to practice.
- VIII. Applicant has never been charged, arrested, or convicted of a criminal offense or offenses.

- IX. Applicant has not filed for pro hac vice admission in the United States District Court for the Northern District of Texas during the past three (3) years.
- X. Applicant has read *Dondi Properties Corp. v. Commerce Savs. & Loan Ass'n*, 121 F.R.D.284 (N.D. Tex 1988) (en banc), and the local civil rules of this court and will comply with the standards of practice adopted in *Dondi* and with the local civil rules.
- XI. Applicant respectfully requests to be admitted to practice in the United States District Court for the Northern District of Texas for purposes of filing an Amicus Brief in this cause only. Applicant certifies that a true and correct copy of this document has been filed in the court's ECF filing system and served upon each attorney of record through ECF. The filing fee of \$100 has or will be promptly submitted through PACER.

Respectfully submitted, this 10th day of February 2023.

By: /s/J. Marc Wheat
J. Marc Wheat
General Counsel
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CERTIFICATE OF SERVICE

I certify that this document will be served on all defendants via ECF and via first class United States mail and email to:

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This 10th day of February 2023.

ADVANCING AMERICAN FREEDOM

By: /s/J. Marc Wheat
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